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BY ECF

Hon. Brian M. Cogan, United States District Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Justin Sherwood v. City of New York, et al., 22-cv-7505 (BMC)

Your Honor:

I write jointly on behalf of all parties to request that the Court extend the current August 14, 2023 deadline by which the parties must submit settlement documents for the Court to “So Order” pursuant to the Court’s June 30, 2023 order dismissing the case in light of the parties’ settlement in principle by an additional 45 days, or until September 28, 2023. There has been no prior application for this relief. All parties join in this request.

The parties ask for this additional time for the following reasons: The settlement the parties have reached contemplates not only payments to Plaintiff from Defendant City and a number of the individual Defendants, but also the parties’ either coming to an agreement as to (1) a reasonable amount for attorney’s fees, costs, and expenses and (2) whether certain documents disclosed by Defendants in discovery warrant treatment as “Confidential” under the protective order in the case, or making an application to the Court to rule on one or both of those issues. The parties are still working on them. Additionally, for Plaintiff’s counsels’ part, Mx. Green’s father recently passed away. As a result, Mx. Green was out of the office and unavailable until last week. If the Court grants the requested extension, the parties are hopeful we will be able to resolve one or both of the remaining issues without the need to make an application to the Court. And, if we are unable to do so, having the additional time requested would allow the parties to narrow any disputes that might remain to present to the Court.

Thank you for your attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver